

### **REMARKS**

The claims have not been amended. Accordingly, claims 1-12 are currently pending in the application, of which claims 1, 7, and 9 are independent claims. Applicants appreciate the indication that claims 2-4, 6, 8, and 11 contain allowable subject matter.

In view of the following Remarks, Applicants respectfully request reconsideration and timely withdrawal of the pending objections and rejections for the reasons discussed below.

#### ***Rejections Under 35 U.S.C. § 103***

Claims 1, 5, 7, 9-10, and 12 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over U.S. Patent No. 6,937,213 issued to Iwasa *et al.* ("Iwasa") in view of U. S. Patent No. 4,029,937 issued Russell ("Russell"). Applicants respectfully traverse this rejection for at least the following reasons.

To establish an obviousness rejection under 35 U.S.C. § 103(a), four factual inquiries must be examined. The four factual inquiries include (a) determining the scope and contents of the prior art; (b) ascertaining the differences between the prior art and the claims in issue; (c) resolving the level of ordinary skill in the pertinent art; and (d) evaluating evidence of secondary consideration. *Graham v. John Deere*, 383 U.S. 1, 17-18 (1966). In view of these four factors, the analysis supporting a rejection under 35 U.S.C. 103(a) should be made explicit, and should "identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the [prior art] elements" in the manner claimed. *KSR Int'l. Co. v. Teleflex, Inc.*, 550 U.S. \_\_\_, slip op. at 14-15 (2007). Furthermore, even if the prior art may be combined, the combination must disclose or suggest all of the claim limitations. *See in re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

The examiner has failed to establish a *prima facie* case of obviousness at least because the examiner has not identified a persuasive reason that would have prompted a person of

ordinary skill in the relevant field to combine Iwasa and Russell in the manner claimed. One of ordinary skill in the art at the time the invention was made would not have found it obvious to combine the teachings of Iwasa and the teachings of Russell because they are directed to non-analogous art. Iwasa discloses a method and device for driving a plasma display panel in which charges can be precisely equalized in all cells before addressing the cells (col. 1, lines 7-15). On the other hand, Russell discloses an apparatus for heating electrically resistive liquids by passing electrical current through the liquid itself (col. 1, lines 6-10). Because Iwasa and Russell are non-analogous art, one of ordinary skill in the art at the time the invention was made would not have relied upon the combination of Iwasa and Russell to address the particular problem with which Applicant was concerned. MPEP 2141.01(a)(I).

Even if the prior art elements could be combined, the combined prior art elements do not disclose or suggest all of the claim limitations.

Claim 1 recites, *inter alia*:

a first capacitor coupled between a gate and an active node of the transistor, the first capacitor having a temperature characteristic opposite to a temperature characteristic of the negative feedback element.

Iwasa and Russell, alone or in combination, fail to teach or suggest at least these features. The examiner asserts that Iwasa's capacitor C3 of Figure 13 and col. 13, lines 40-59 teaches the arrangement of the first capacitor of claim 1 (Office Action, page 2). Applicants disagree. Although a first terminal of Iwasa's capacitor C3 is coupled with a gate terminal of transistor Q1, a second terminal of capacitor C3 is not coupled to an "active node" of transistor Q1. Rather, the second terminal of capacitor C3 is coupled to an output terminal of pulse amplifier F1. (col. 13, lines 40-43; Fig. 13). Thus, capacitor C3 is not "coupled between a gate and an active node of the transistor." This argument was made in the previous Reply filed on June 12, 2007 but was not addressed in the Office Action.

Furthermore, the Office Action acknowledges that Iwasa "does not specifically teach the first capacitor having a temperature characteristic opposite to a temperature characteristic of the negative feedback element" (page 2). The Office Action then relies upon Russell to cure this deficiency and states that "Russell teaches a capacitor having a temperature characteristic opposite to a temperature characteristic of the negative feedback element" (page 3). The Office Action asserts that col. 4, lines 2-25 disclose this feature, but this portion of Russell is completely silent with regard to temperature characteristics of capacitors, much less a relationship between the temperature characteristics of two capacitors. Accordingly, Russell also fails to disclose "the first capacitor having a temperature characteristic opposite to a temperature characteristic of the negative feedback element."

Claim 7 recites, *inter alia*:

a first capacitor coupled between the gate and a drain of the transistor;  
and  
a second capacitor coupled between the gate and the drain of the transistor, the second capacitor having a temperature characteristic opposite a temperature characteristic of the first capacitor.

Iwasa and Russell, alone or in combination, fail to teach or suggest at least these features. The examiner asserts that Iwasa's capacitor C2 and capacitor C4 of Figure 14 respectively teach the first and second capacitors of claim 7 (Office Action, page 3). Applicants disagree. Although a first terminal of capacitor C2 is coupled with a node of transistor Q5, a second terminal of capacitor C2 is connected to ground. Thus, capacitor C2 is not "coupled between the gate and a drain of the transistor." Similarly, capacitor C4 is not "coupled between the gate and the drain of the transistor." This argument was made in the previous Reply filed on June 12, 2007 but was not addressed in the Office Action.

Furthermore, the Office Action acknowledges that Iwasa "does not specifically teach the first [sic] capacitor having a temperature characteristic opposite to a temperature characteristic of the first capacitor" (page 3). The Office Action relies upon Russell to cure this deficiency and

states that "Russell teaches a capacitor having a temperature characteristic opposite to a temperature characteristic of the first capacitor" (page 3). The Office Action asserts that col. 4, lines 2-25 disclose this feature, but this portion of Russell is completely silent with regard to temperature characteristics of the capacitors, much less a relationship between the temperature characteristics of two capacitors. Accordingly, Russell also fails to disclose "the second capacitor having a temperature characteristic opposite a temperature characteristic of the first capacitor."

Claim 9 recites, *inter alia*:

a first capacitor coupled between the gate and the source of the transistor, the first capacitor having a temperature characteristic opposite to a temperature characteristic of the parasitic capacitance.

Iwasa and Russell, alone or in combination, fail to teach or suggest at least these features. The examiner asserts that Iwasa's capacitor C1 of Figure 13 and col. 8, lines 47-53 teaches the first capacitor of claim 9 (Office Action, page 4). Applicants disagree. Although a first terminal of capacitor C1 is coupled with a node of transistor Q1, a second terminal of capacitor C1 is connected to ground. Thus, capacitor C1 is not "coupled between the gate and the source of the transistor." This argument was made in the previous Reply filed on June 12, 2007 but was not addressed in the Office Action.

Furthermore, the Office Action acknowledges that Iwasa "does not specifically teach the first capacitor having a temperature characteristic opposite to a temperature characteristic of the parasitic capacitance" (page 4). The Office Action relies upon Russell to cure this deficiency and states that "Russell teaches a capacitor having a temperature characteristic opposite to a temperature characteristic of the parasitic capacitance" (page 4). The Office Action asserts that col. 4, lines 2-25 disclose this feature, but this portion of Russell is completely silent with regard to temperature characteristics of the capacitors, much less a relationship between the temperature characteristics of two capacitors. Accordingly, Russell also fails to disclose "the

first capacitor having a temperature characteristic opposite to a temperature characteristic of the parasitic capacitance.”

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection of claims 1, 7, and 9. Claims 2-6, 8, and 10-12 depend from claims 1, 7, and 9, respectively, and are allowable at least for this reason. Since none of the other prior art of record, whether taken alone or in any combination, discloses or suggests all the features of the claimed invention, Applicants respectfully submit that independent claims 1, 7, and 9, and all the claims that depend therefrom, are allowable.

***Allowable Subject Matter***

Applicants appreciate the indication that claims 2-4, 6, 8, and 11 contain allowable subject matter. Claims 2-4, 6, 8, and 11 have not been amended because Applicants respectfully submit that claims 2-4, 6, 8, and 11 depend from an allowable base claim and are allowable at least for this reason.

Accordingly, Applicants submit that claims 2-4, 6, 8, and 11 are in condition for allowance.

**CONCLUSION**

Applicants believe that a full and complete response has been made to the pending Office Action and respectfully submit that all of the stated objections and grounds for rejection have been overcome or rendered moot. Accordingly, Applicants respectfully submit that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact Applicants' undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,

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Date: November 14, 2007

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